

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

22-09895 BKOBJ01

BROCK & SCOTT, PLLC

302 Fellowship Rd, Suite 130

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(844) 856-6646

Attorneys for Wells Fargo Bank, N.A.

In Re:

MAXINE C. CHRISTIAN  
A/K/A MAXINE FRANCESCA  
COLEMAN-CHRISTIAN

Case No: 22-14412-SLM

Judge: STACEY L. MEISEL

Chapter: 13

**OBJECTION TO DEBTOR'S REQUEST FOR LOSS MITIGATION**

Wells Fargo Bank, N.A. ("Creditor"), by and through its undersigned counsel, and hereby responds to the Request for Loss Mitigation [DE 4] filed on June 2, 2022 and in support thereof, shows unto the Court as follows:

1. Creditor objects to any Order directing it to participate Loss Mitigation because the Debtor's account with Creditor was charged-off effective November 26, 2013 and Creditor has ceased all collection activity as of that date.

2. Based on the account's charge-off status, Creditor will file a total debt Proof of Claim in the instant case.

3. The terms of the underlying Mortgage and Note cannot be modified following a charge-off, so the Debtor will not qualify for any Loan Modification options and entry into the Loss Mitigation Program would be futile.

**WHEREFORE**, Creditor respectfully requests that this Honorable Court deny Debtor's Request for Loss Mitigation and for any other relief the Court deems just and proper.

/s/Matthew Fissel

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**CERTIFICATION OF SERVICE**

1. I, Cassondra Emanuel:

☐ represent the \_\_\_\_\_ in the above-captioned matter.

☒ am the secretary/paralegal for BROCK & SCOTT, PLLC, who represents Wells Fargo Bank, N.A. in the above captioned matter.

☐ am the \_\_\_\_\_ in the above case and am representing myself.

2. On June 17, 2022, I sent a copy of the following pleadings and/or documents to the parties listed below:

OBJECTION TO DEBTOR'S REQUEST FOR LOSS MITIGATION

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 17, 2022

/s/ Cassondra Emanuel

Cassondra Emanuel

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
MAXINE C. CHRISTIAN 36 CONCORD PL UNION, NJ 07083-4220	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail —

		<input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
DAVID G. BESLOW 7 GLENWOOD AVENUE SUITE 311B EAST ORANGE, NJ 07017	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Marie-Ann Greenberg 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
U.S. Trustee, US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	US Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/>

		Other _____ (as authorized by the court *)
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\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.